

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: ) 19-MD-2875 (RBK-JS)  
)  
)  
) Camden, NJ  
VALSARTAN NDMA PRODUCTS ) October 10, 2019  
LIABILITY LITIGATION ) 2:00 p.m.

TRANSCRIPT OF STATUS CONFERENCE  
BEFORE THE HONORABLE JOEL SCHNEIDER  
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

For the Plaintiffs: ADAM M. SLATER, ESQUIRE  
CHRISTOPHER J. GEDDIS, ESQUIRE  
MAZIE, SLATER, KATZ &  
FREEMAN, LLC  
103 Eisenhower Parkway  
2nd Floor  
Roseland, NJ 07068

RUBEN HONIK, ESQUIRE  
DAVID J. STANOCH, ESQUIRE  
GOLOMB & HONIK, PC  
1835 Market Street  
Suite 2900  
Philadelphia, PA 19103

DANIEL NIGH, ESQUIRE  
LEVIN PAPANTONIO  
316 South Baylen Street  
Pensacola, FL 32502

CONLEE S. WHITELEY, ESQUIRE  
KANNER & WHITELEY, LLC  
701 Camp Street  
New Orleans, LA 70130

APPEARANCES: (continued)

For the Plaintiffs: GEORGE T. WILLIAMSON, ESQUIRE  
FARR, FARR, EMERICH, HACKETT,  
CARR & HOLMES, P.A.  
99 Nesbit Street  
Punta Gorda, FL 33950

For the Defendants: SETH A. GOLDBERG, ESQUIRE  
DUANE MORRIS, LLP  
30 South 17th Street  
Philadelphia, PA 19103

CLEM C. TRISCHLER, ESQUIRE  
PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP  
One Oxford Centre  
38th Floor  
Pittsburgh, PA 15219

BRIAN RUBENSTEIN, ESQUIRE  
GREENBERG TRAUIG  
1717 Arch Street, Suite 400  
Philadelphia, PA 19103

JANET L. POLETTTO, ESQUIRE  
ROBERT E. BLANTON, JR., ESQUIRE  
673 Morris Avenue  
Springfield, NJ 07081

JESSICA M. HEINZ, ESQUIRE  
CIPRIANI & WERNER, PC  
450 Sentry Parkway, Suite 200  
Blue Bell, PA 19422

STEVEN M. HARKINS, ESQUIRE  
GREENBERG, TRAUIG  
Terminus 200  
3333 Piedmont Avenue, Suite 2500  
Atlanta, GA 30305

Audio Operator: SARAH ECKERT

Transcribed by: DIANA DOMAN TRANSCRIBING, LLC  
P.O. Box 129  
Gibbsboro, New Jersey 08026-0129  
Office: (856) 435-7172  
Fax: (856) 435-7124  
Email: [dianadoman@comcast.net](mailto:dianadoman@comcast.net)

Proceedings recorded by electronic sound recording, transcript  
produced by transcription service.

I N D E X

ARGUMENT:

PAGE

Re: Hetero and Aurobindo corporate representatives

By Mr. Slater 7, 8

By Ms. Poletto 8, 9

By Ms. Heinz 9

Re: Fact sheets

By Mr. Slater 13

By Mr. Rubenstein 13

Re: Motions for extensions

By Mr. Slater 14

By Mr. Stanoch 15

Re: One lead plaintiffs' counsel for each defendant

By Mr. Slater 17

By Mr. Trischler 17

By Mr. Goldberg 18

Colloquy

5

1 (The following telephone conference was held at 2:00  
2 p.m.)

3 MS. WHITELEY: Good afternoon, Your Honor. This is  
4 Conlee Whiteley.

5 THE COURT: Are we the only people on the line, Ms.  
6 Whiteley?

7 MS. WHITELEY: No, Your Honor. I believe there's at  
8 least one other person I heard click in.

9 MR. RUBENSTEIN: Hi, Your Honor. This is Brian  
10 Rubenstein with Greenberg, Traurig on behalf of the Teva  
11 defendants.

12 (Automated telephone voice announcing that attorneys  
13 are now in the conference.)

14 THE COURT: This is -- this is Judge Schneider. Do  
15 we -- do we have on the conference the people who were going  
16 to talk on behalf of the plaintiffs' group and the defendants'  
17 group?

18 MR. GOLDBERG: Your Honor, on behalf of defendants  
19 and -- this is Seth Goldberg.

20 THE COURT: Great. How about the plaintiffs?

21 MR. GEDDIS: Your Honor, this is Chris Geddis from  
22 Mazie, Slater, Katz and Freeman. Adam is just finishing up a  
23 deposition I know, but I know that he's going to be on the  
24 call.

25 THE COURT: All right. Let's wait a moment.

Colloquy

6

1 (Pause in proceedings)

2 THE COURT: Is there anyone else who could speak on  
3 behalf of the plaintiffs while we're waiting for Mr. Slater?  
4 Mr. Honik?

5 MR. HONIK: Your Honor, I can certainly try. I  
6 apologize. I happen to be in my car in between appointments.  
7 I alerted my plaintiffs' co-counsel that I might not even be  
8 on the call, but I can -- we can certainly, you know, begin  
9 the conversation.

10 THE COURT: Okay.

11 MS. WHITELEY: Daniel is also on the phone, Your  
12 Honor, as well as I, and we could go forward.

13 THE COURT: Terrific.

14 MR. HONIK: We can.

15 THE COURT: Okay. I have the letters from counsel.  
16 Thank you very much. What I'd like to do is to save for the  
17 last issue to be discussed the custodian and search term  
18 issue. That seems to be the most problematic. So let's --  
19 let's save that for last.

20 So I want to go down the issues that are in  
21 plaintiffs' letter, start with number two, make sure we cover  
22 all the issues in defendants' letter, and then we'll circle  
23 back to deal with the custodian and search term issue.

24 Somebody is moving around. Can you -- can you put  
25 your phone on mute, please.

Slater - Argument

7

1 MR. SLATER: Hello, Your Honor. I don't know if  
2 that was me. It's Adam Slater. I just finished my deposition  
3 so I'm on the call. I don't know if that was me, but I  
4 apologize.

5 THE COURT: Okay. So just to bring you up to speed,  
6 we'll save the custodian and search term issue for the last  
7 item to discuss since that seems to be the most problematic.  
8 I have the parties' letters.

9 The first issue is the Hetero and Aurobindo  
10 corporate representatives. Is it correct that the Hetero  
11 issue is moot now? Somebody help me.

12 MR. SLATER: I don't think it's moot on Hetero yet  
13 because we're still waiting to confirm service and -- but I  
14 think the letter, Your Honor, said that they plan to produce  
15 the documents.

16 So if they're producing all the documents, it's moot  
17 as to the core discovery documents, if that's what they're  
18 offering to produce. But it was unclear whether they have all  
19 of the documents that the foreign entities have.

20 THE COURT: I don't know. That was my impression,  
21 but is Hetero's counsel on the phone? Mr. --

22 MR. GOLDBERG: Your Honor, this is Seth Goldberg. I  
23 understand they are on. Just a reminder that in order to be  
24 heard, you have to press star-1 to unmute yourself from this  
25 line.

Poletto - Argument

8

1 MS. POLETTTO: Thank you, Seth. I was desperately  
2 trying to figure out how to unmute you. I just hit 1; nothing  
3 was happening. I apologize, Your Honor. Yes, it's Janet  
4 Poletto. I'm on for Hetero, USA.

5 As I had indicated to Mr. Slater, Hetero, USA, is  
6 prepared to produce the remaining core discovery obtaining  
7 from Hetero Labs those documents it did not previously have in  
8 its possession. The only exception being documents that  
9 another defendant in the case has, that being Camber.

10 And I don't know what conversations plaintiff had  
11 with Camber or not, but we were prepared to produce remaining  
12 core discovery, get whatever we need from India. We have we  
13 believe all this at this point in time and are going through  
14 it and --

15 THE COURT: Great.

16 MS. POLETTTO: -- should be able to produce that by  
17 the end of next week.

18 THE COURT: Terrific. Why don't you produce those,  
19 and, Mr. Slater, if there's an issue, just let us know so that  
20 for the time being we'll just note that it appears subject to  
21 confirmation that the Hetero 30(b)(6) deposition on the  
22 control issue is not necessary, which leaves us with  
23 Aurobindo. I have --

24 MR. SLATER: I'm sorry to interrupt, but there's one  
25 piece of that that I want to just make sure we're clear on.



Heinz - Argument

9

1 Ms. Poletto said Hetero Labs. I just want to make sure,  
2 because there's two Indian entities. One's Hetero Drugs,  
3 Limited, and we've been working to serve both of them  
4 separately. I'm just curious if they are producing for that.  
5 I'm sorry to interrupt. I just wanted to make sure on that  
6 one.

7 MS. POLETTTO: From my understanding, Adam, there  
8 would be no core discovery documents that would be coming  
9 directly from Hetero Drugs, but to the extent there are, then  
10 we would be obtaining those as well.

11 MR. SLATER: Thank you. Sorry to interrupt.

12 THE COURT: Okay. Is Aurobindo's counsel on the  
13 phone?

14 MS. HEINZ: Yes, Your Honor.

15 THE COURT: Are we going ahead with your 30(b)(6)  
16 deposition on the control issue?

17 MS. HEINZ: At this time it looks like we are still  
18 going forward. I still don't have any updates regarding  
19 whether Aurobindo, Limited, has been served. I believe they  
20 were served in an Irbesartan case that was dismissed either  
21 shortly before or shortly after the MDL was formed, but that's  
22 all the information that I have. I'm not aware of them being  
23 served yet in this action, in this MDL.

24 So at this point we are still going to proceed with  
25 the deposition. I did serve objections and I have been -- Mr.

1 Slater and I have been conversing on those throughout the past  
2 few weeks, hoping to reach an agreement with him on the scope.  
3 Obviously, we're looking at the narrow -- related to the  
4 documents that we have not produced pursuant to the Court's  
5 discovery order.

6 THE COURT: All right. Let me -- let me just step  
7 in here. To the extent you don't work out your objections,  
8 we're going to address all of those issues next Wednesday at  
9 the in-person conference.

10 I briefly looked at your objections, Aurobindo, and  
11 let's make something clear. It's understood that the Court  
12 identified the core discovery documents that have to be  
13 produced. However, the purpose of the 30(b)(6) deposition is  
14 to see if the domestic entity has "control" such that it  
15 should produce the foreign documents.

16 That document production or request is broader than  
17 the core discovery. Plaintiffs are going to need those  
18 documents which relate to the control issue in order to make  
19 their case. So it wasn't entirely clear to the Court what  
20 the nature of the objection was, but if the nature of the  
21 objection is, the only documents that have to be produced are  
22 the core discovery, that's incorrect. In order to --

23 MS. HEINZ: It's --

24 THE COURT: Okay.

25 MS. HEINZ: I'm sorry, I apologize.

Colloquy

11

1 THE COURT: Okay. Let me just finish. In order to  
2 get to the answer to the question whether or not there's  
3 control, plaintiff is entitled to request relevant documents  
4 regarding the control issue which likely are different than  
5 the core discovery. I just wanted to make that clear, because  
6 I wasn't clear from the objections whether or not that was the  
7 position Aurobindo was taking.

8 MS. HEINZ: It's a little different from my  
9 perspective anyway. The way I'm looking at it is, I view --  
10 obviously, the issue is whether they have control of these  
11 documents, but that's just it. The way I'm looking at it is  
12 it's these documents that the Court ordered pursuant to the  
13 core discovery, and the way that their notice was phrased was  
14 very broad.

15 It seemed like they were asking, you know, about  
16 control of any documents. So I just wanted to make sure that  
17 we were focused on, you know, the core discovery that we  
18 didn't produce and control over that information.

19 THE COURT: Well, we'll hash out all of these issues  
20 next Wednesday. You know the Court's position with regard to  
21 this 30(b)(6) issue.

22 I think it's a distraction. I think it's -- I  
23 regret that we're going through it and -- and taking time from  
24 the crux of the case to get to this control issue. But if  
25 that's the position your client takes, the Court has no

1 recourse but to give plaintiff the right to take this  
2 discovery. So to the extent there's any disputes remaining  
3 regarding Aurobindo's 30(b)(6) deposition, we'll address them  
4 and decide them next Wednesday.

5 The next issue, the macro -- the macro discovery  
6 issue. I would really like to finalize this issue next -- by  
7 next Wednesday. I want to identify the -- what I call the  
8 macro or big picture issues that we need to address in order  
9 that the parties can sharpen their pencils with regard to the  
10 custodian and search term issues.

11 I saw that defendants took a stab at it. If the  
12 parties can meet and confer on this issue before next  
13 Wednesday, I'd like to leave next Wednesday with a final list  
14 of the -- of these issues we have to address. We'll agree  
15 upon a briefing schedule and get those discovery issues  
16 decided promptly.

17 With regard to defendants' letter, certainly some of  
18 them are self-explanatory, but the Court is going to need more  
19 help when there's sort of a general issue about the scope of  
20 relevant testing. We need to be more specific, you know, are  
21 we talking about time frame? Are we talking about countries,  
22 et cetera, et cetera?

23 So the parties are going to be asked to brief these  
24 issues so we could be able to specifically identify the issues  
25 that we have to tee up and decide. So that'll be another

1 issue that will be on the agenda for next Wednesday, and we  
2 hope to finalize that list next Wednesday and get a briefing  
3 schedule as well.

4 Can you update the Court on the fact sheets?

5 MR. SLATER: On the defendants' fact sheets, Your  
6 Honor, frankly, it's our -- it's completely on the plaintiffs.  
7 I think that we just have not gotten it done because we  
8 focused so much on the meet and confer process with the --  
9 with the custodians issue, and we owe that to them, and we're  
10 going to try to get that to them by tomorrow by the end of the  
11 day. But it's on us, we acknowledge that, and we need to get  
12 it to them.

13 THE COURT: Okay.

14 MR. SLATER: They had -- they had sent us a red line  
15 and a re-drafting of it and we have to get back to them.

16 THE COURT: Okay. The ball's in the plaintiffs'  
17 court, and hopefully we'll get that soon.

18 General discovery requests, I guess responses or  
19 objections rather are due October 15, and we'll see what  
20 happens.

21 Third-party fact sheets, I guess that's in  
22 defendants' court?

23 MR. RUBENSTEIN: Hi, Your Honor. This is Brian  
24 Rubenstein with Greenberg Traurig. So we actually sent a  
25 revised draft to the plaintiffs on October 4th, and we were

1 hoping to meet and confer this week I think, you know, as Mr.  
2 Slater said, I think the meet and confer process on the  
3 custodians probably got in the way.

4 But, you know, I think there's only just a few  
5 limited issues that we need to discuss, and we should be able  
6 to hopefully resolve those by next week's in-person  
7 conference.

8 MR. SLATER: I agree, Your Honor. I've been told by  
9 the people who represent the TPPs that they're very -- it's  
10 very close and there aren't a lot of differences, but we'll  
11 get back to them by tomorrow with our response if it hasn't  
12 already happened, which it sounds like it didn't.

13 THE COURT: All right. Sounds good.

14 Mr. Slater, I don't know if you or Mr. Goldberg can  
15 answer this, but you saw on the docket there was a bunch of  
16 motions for extensions that were filed. I hope there's a way  
17 that we can short-circuit this rather than having to decide  
18 whatever it is 20 or 30 or 40 similar-type motions. I don't  
19 quite understand what the issue is and why all of the sudden  
20 this issue came up.

21 MR. SLATER: I'm not sure either, Your Honor.

22 I'm making an assumption that it might be the  
23 deadline to file a short form complaint, and I'm thinking that  
24 there -- whether or not there would be a request by Mr.  
25 Goldberg or a defendant for an extension to answer, so if

1 that's the issue, I would just suggest maybe we can enter into  
2 some sort of an order to give people a little more time, if  
3 that's -- if it's reasonable and just get them done and tell  
4 everybody's don't, you know, don't keep filing these motions  
5 or try to get them all done within a period of time.

6 But I don't know the specific circumstances. Those  
7 people haven't contacted certainly myself, so I wasn't aware  
8 of the issue existed until Your Honor forwarded those -- those  
9 notices, which I'm sure is not fun for the Clerk's Office to  
10 have to deal with.

11 THE COURT: It looks like they were all filed by  
12 this Kentucky counsel. Can someone from your group contact  
13 this Kentucky counsel and see if there's a way that will  
14 short-circuit this?

15 MR. SLATER: Absolutely.

16 THE COURT: Okay. Thank you very much.

17 I don't know, is Optum in the case and United Health  
18 Group in the case? It looks like they're asking for an  
19 extension of time to serve those defendants.

20 MR. SLATER: I'm assuming they were named in their  
21 complaint, Your Honor. I haven't read their complaint, but  
22 I'm assuming that they named them.

23 THE COURT: Were they in the case before?

24 MR. STANOCH: Yes. Your Honor, this is David  
25 Stanoch for plaintiff. OptumRX has a mail order pharmacy and

1 is named in the Master Complaints which were filed in June,  
2 but I think that was the first time they were added to the  
3 action at that time. So they should be here, and we did  
4 effect service on them for the MDL, but I'm not sure of the  
5 specific situation with this case, but we can look into it.

6 THE COURT: Much appreciated. So hopefully we'll  
7 have an update by next Wednesday.

8 All right. Before we get to the custodian and  
9 search term issue, are there any other issues to address on  
10 this call? Okay. Sounds like none.

11 Obviously, we're getting different versions of what  
12 happened at the meeting, not surprising, but I was encouraged  
13 by Mr. Goldberg's letter which indicates that steps are being  
14 taken to move forward on this issue.

15 One suggestion I have and I don't know if you  
16 already have this in place is, one thing that occurs to the  
17 Court that makes this a little complicated is we have  
18 different defendants that have to be dealt with. I don't know  
19 exactly how many, somewhere between five and eight I guess.

20 If it hasn't been done, I think it would be very  
21 helpful if the plaintiffs could identify one attorney who is  
22 the lead contact for each of the defendants. So, for example,  
23 every defendant doesn't have to go through Mr. Slater or some  
24 other plaintiffs' counsel. There would be one plaintiffs'  
25 attorney who is -- who is taking the lead with regard to each



1 of the defendants, so that that defendant would know the one  
2 person it should go to to communicate. Has that been done,  
3 and if it hasn't, do you see any reason why it shouldn't be  
4 done?

5 MR. SLATER: We haven't done that in a formal sense,  
6 but I think that as a de facto matter it's been happening.  
7 Because, for example, after the meeting or during the closing  
8 of the meeting on Monday, we had an agreement with the  
9 defendants to get a time to speak to them, and different  
10 attorneys from our group have engaged with the defendants.  
11 And I would assume that those attorneys who were on those  
12 calls with those particular defendants, would continue to  
13 run point for those discussions that have began. So I think  
14 as a de facto matter that basically is occurring at this  
15 point.

16 THE COURT: Okay. So from the defendants'  
17 perspective, you're all on the phone. Do each of you know who  
18 your primary point of contact is?

19 MR. TRISCHLER: Good afternoon, Your Honor. This is  
20 Clem Trischler for the Mylan defendants.

21 I have been -- the answer to your question is yes.  
22 We have had conferences as recently as today. I think Layne  
23 Hilton and Marlene Goldenberg have been the primary folks that  
24 we've been dealing with, but I certainly know whom to talk to  
25 on plaintiffs' side to keep the lines of communications

1 moving. And that -- you know, that works so far from our  
2 perspective. Discussions have been productive and are moving  
3 forward.

4 THE COURT: Okay. Good. Does that go for all of  
5 our defendants?

6 MR. GOLDBERG: Seth Goldberg for ZHP and -- myself,  
7 Barbara Schwartz and Alex Waleko are the people taking the  
8 lead on this for us. And we have also been in contact with  
9 Layne Hilton since the October 7th meeting to follow up, and  
10 we will reach out to Layne with the follow-up information that  
11 we're going to be getting based on that meeting.

12 THE COURT: All right. It sounds like things are  
13 moving along. We'll address where we are with regard to each  
14 of the defendants at next Wednesday's conference.

15 From the Court's perspective, as I said in my email,  
16 we want to give the parties an opportunity to try and work  
17 this out amongst themselves. We insist that the parties act  
18 in good faith which I think they're doing. It absolutely,  
19 positively has to be a collaborative process, because if it's  
20 not, it'll never get done.

21 If need be, the Court is prepared to order  
22 representatives of the defendants to meet informally with the  
23 plaintiffs, but before we do that, as we've said, we want to  
24 fulfill our commitment to the defendants that the parties  
25 first be afforded the opportunity to try and work it out

1 themselves.

2           So you have another week at this issue. We're going  
3 to deal with each of the individual defendants next Wednesday.  
4 I would prepare to be here all day on Wednesday because we  
5 have some important issues to deal with, and you could also  
6 use the facilities of the courthouse while you're all here to  
7 have separate meetings or altogether. So we'll see where we  
8 are next Wednesday, what additional work has to be done.

9           This is one of the -- if not, the most important  
10 issue that we have to deal with in the case. It's going to  
11 set the groundwork for the entire ESI production. My feeling  
12 is, having done this many, many times in practice and on the  
13 bench that the more time we invest in the short term to get  
14 this right the more time and money we save in the long term.

15           No one is going to convince me otherwise, but it's  
16 in the defendants' best interest to have as fulsome an ESI  
17 production as possible. It's much cheaper and more efficient  
18 and less cumbersome to do it one time rather than to have to  
19 go back and do it again. So I strongly encourage the parties  
20 to continue to work together in good faith in the  
21 collaborative process to work out the custodians and search  
22 terms that have to be set.

23           If it means we have to order production of  
24 organizational charts, of course, we'll do that. I mean,  
25 that's just -- I don't know why we need an order to do that.

Colloquy

20

1 Another issue you have to discuss is the translation  
2 issue if these documents are going to be in a foreign  
3 language. I don't know if we're going to have the same  
4 problem we had in Benicar where each side had to get their own  
5 translator to -- because of differences in translation, but  
6 these are the type of issues we -- we should work out now,  
7 because come December, this all has to be finalized and  
8 starting the new year, that's when the defendants are going to  
9 have to do their search.

10 So there's not a whole lot of time to get all this  
11 done, so I commend the parties and encourage the parties to  
12 continue their diligent efforts to try and reach some sort of  
13 an agreement. And we'll find out next Wednesday where we  
14 stand. I don't know if there's anything else we can add on  
15 this issue except encouraging the parties to continue to meet  
16 and confer and that's all I have to say about the issue.

17 Anyone else have anything to add?

18 MR. SLATER: Your Honor, it's Adam Slater.

19 The only thing I would add is in the context of the  
20 macro discovery issues, I think that these discussions with  
21 the defendants are helping to let us know what issues may  
22 exist. And I think that -- I know we want to try to get it  
23 done by next week, but I have a sneaky suspicion that when we  
24 get the defendants' responses to our -- our document requests,  
25 that they will probably, through that process, many issues

1 will come up.

2 So we obviously will do what we can to get you the  
3 issues that we have by next week. But my expectation is that  
4 in the discussions we may learn that there are some other  
5 macro-type issues that become more -- more focused.

6 For example, just looking at their letters today  
7 from ZHP, there's -- there seems to be an issue about the  
8 relationship between ZHP and their U.S. entities and the true  
9 nature of it and what their function is. And it seems to be  
10 that there's something about that corporate organization that  
11 they're putting up as some sort of an objection or -- or a  
12 segmenting of discovery, so I don't know if that's going to  
13 continue to be an issue.

14 It's just an example that jumped out at me reading  
15 the document today, but I just wanted to flag that for the  
16 Court that we're probably still a little bit early in our  
17 educational process on the plaintiffs' side to know what  
18 really is at issue.

19 THE COURT: Mr. Slater, it's unfortunate the way the  
20 timing worked out, that the conference is the 16th, and the  
21 responses are due the 15th, but we'll deal with it and if you  
22 need a little bit more time, we'll deal with it. We'll get it  
23 done.

24 MR. SLATER: Thank you, Judge.

25 THE COURT: All right. Anything else for the

Colloquy

22

1 plaintiffs? And anything else for the defendants?

2 MR. GOLDBERG: No, Your Honor.

3 THE COURT: All right. Thank you, counsel. Have a  
4 good day and we're adjourned.

5 MR. SLATER: Thank you.

6 (Telephone conference concluded at 2:30 p.m.)

7 \* \* \*

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

C E R T I F I C A T I O N

I, Lois A. Vitarelli, court approved transcriber,  
certify that the foregoing is a correct transcript from the  
official electronic sound recording of the proceedings in the  
above-entitled matter.

October 24, 2019

LOIS A. VITARELLI

DIANA DOMAN TRANSCRIBING, LLC